

In The United States District Court
Middle District Of Pennsylvania

Robert L. Longo JR
Plaintiff

Hannah Trostle, RNS
Mr. Aguelles, PA
Dr. Voorstad, MD
Defendants

No. 3:22-CV-1199
Judge: Mariani

FILED
SCRANTON

JUN 23 2023

Amended Complaint

Per DEPUTY CLERK

1.) Defendant, Hannah Trostle, RNS, is a licensed professional with offices in Cumberland County, Pennsylvania. Plaintiff is asserting a professional liability claim against this Defendant.

2.) Defendant, Mr. Aguelles, PA, is a licensed professional with offices in Cumberland County, Pennsylvania. Plaintiff is asserting a professional liability claim against this Defendant.

3.) Defendant, Dr. Voorstad, MD, is a licensed professional with offices in Cumberland County, Pennsylvania. Plaintiff is asserting a professional liability claim against this Defendant.

4.) All Defendants are held liable under Pa.R.Civ.P. 1042.1(a)(2), Pa.R.Civ.P. 1042.1(c)(4)(i), Pa.R.Civ.P. 1042.1(c)(4)(vii), 40 P.S. § 1303.503 (relating to the MCARE Act), and 63 P.S. § 211 (relating to the PNL Act of 1951).

5.) All Defendants are to care for the Plaintiff under the United States 8th Constitutional Amendment.

6.) All Defendants breached that duty by denying Plaintiff access to appropriately qualified health care personnel.

7.) Due to the breach of duty by all Defendants, the Plaintiff's lower back issues continues to get worse due to Defendant's changing policy related to health care.

8.) Plaintiff suffers damage in that the Plaintiff is not capable to perform daily activities adequately and constantly falls while trying to perform said daily activities due to numbness in his legs and feet.

9.) The Defendants fail to refer Plaintiff to a spinal specialist, fail to treat Plaintiff with treatments that could have eliminated pain and suffering at least temporarily, and delays access to medical personnel by refusing to call Plaintiff to "sick call."

10.) Defendants also failed to inquire about facts necessary to make a professional judgment, unjustifiable reliance on non-medical factors to make treatment decisions, and decisions so egregiously bad that they are not based on sound medical judgment.

11.) The Defendants prescribed Plaintiff a seizure medication that Defendant's claim will ease nerve pain but does not do so.

12.) Plaintiff exhausted all administrative remedies all to no avail and continue to deny Plaintiff adequate medical help.

13.) Plaintiff files along with this Amended Complaint, a Certificate Of Merit pursuant to Pa.R.Civ.P. 1042.3(c) for each Defendant.

14.) Plaintiff asserts that all of the claims presented in the Initial Complaint as well as in this Amended Complaint are true and correct and are subject to the penalties for Unsworn Falsification To Authorities.

Date: 06/20/2023

Respectfully Submitted,
Robert L. Longo JR
Robert L. Longo JR, #MO-5290
SCJ - Camp Hill
2500 Lisbon Road
Camp Hill, PA 17001
Plaintiff Pro-Se

In The United States District Court
Middle District Of Pennsylvania

Robert L. Longo JR.
Plaintiff

No. 3:22-CV-1199
Judge: Mariani

^{vs.}
Hannah Trastle, RNS
Mr. Aguelles, PA
Dr. Voorstad, MD
Defendants

Certificate Of Merit As To Hannah Trastle, RNS

I, Robert L. Longo JR, certify that expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

Date: 06/20/2023

Respectfully Submitted,
Robert L. Longo JR
Robert L. Longo JR, #MU-5290
SCI - Camp Hill
2500 Lisburn Road
Camp Hill, PA 17001
Plaintiff Pro-Se

In The United States District Court
Middle District Of Pennsylvania

Robert L. Longo JR.
Plaintiff

No. 3:22-CV-1199
Judge: Mariani

vs.
Hannah Trastle, RNS
Mr. Aguelles, PA
Dr. Voorstad, MD
Defendants

Certificate Of Merit As To Mr. Aguelles, PA

I, Robert L. Longo JR, certify that expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

Date: 06/20/2023

Respectfully Submitted,
Robert L. Longo JR.
Robert L. Longo JR, #MU-5290
SCT - Camp Hill
2500 Lisbon Road
Camp Hill, PA 17001
Plaintiff Pro-Se.

In The United States District Court
Middle District Of Pennsylvania

Robert L. Longo JR
Plaintiff

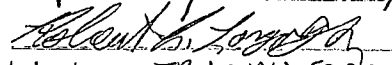
No. 3:22-CV-1199
Judge: Mariani

v.
Hannah Trastle, RNS
McAgnelles, PA
Dr. Voorstad, MD
Defendants

Certificate Of Merit As To Dr. Voorstad, MD

I, Robert L. Longo JR, certify that expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

Date: 06/20/2023

Respectfully Submitted,

Robert L. Longo JR, #MU-5290
SCI-Camp Hill
2500 Lisburn Road
Camp Hill, PA 17001
Plaintiff Pro-Se

Proof of Service

I, Robert L. Longo JR, the Pro-Se Plaintiff in this action, hereby certifies that on this date I sent a true and correct copy of the Amended Complaint and Certificates of Merit via first-class mail to the following parties:

Phillip A. Michael
Deputy Attorney General
Office Of The Attorney General
15th Floor, Strawberry Square
Harrisburg, PA 17120
and

Keanna Seabrooks, Esquire
Samuel H. Foreman, Esquire
Weber Gallagher
4 PPG, 5th Floor
Pittsburgh, PA 15222

Date: 06/20/2023

Respectfully Submitted
Robert L. Longo JR
Robert L. Longo JR, #MU-5290
SCI - Camp Hill
2500 Lisburn Road
Camp Hill, PA 17001
Plaintiff Pro-Se

Robert L. Longo JR
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St Petersburg, FL 33733

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"LEGAL MAIL"

1850131148 BOSS